

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KIM EMILE, *et al.*,

Plaintiffs,

21-cv-3799-JPO-SLC

-against-

NOTICE OF CROSS-MOTION

ETHICAL CULTURE FIELDSTON  
SCHOOL, *et al.*,

Defendants.  
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Please Take Notice that, based upon the accompanying Declaration of Kim Emile, dated August 16, 2023, the supporting Memorandum of Law, dated August 16, 2023, the exhibits attached thereto, and the prior proceedings in this case, the Plaintiffs hereby cross-move for an Order: (1) directing the Plaintiff's former counsel, The Cochran Firm and Derek Sells, to arbitrate any and all issues and disputes between themselves and the Plaintiffs pursuant to the arbitration provisions in their retainer agreements; and (2) granting the Plaintiffs such further and additional relief as the Court deems just and proper.

Dated: August 16, 2023

*s/Nathaniel B. Smith*

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